

**TRADE AND PASSENGER PROCESSING:
Customs' IPR Enforcement Strategy And
Management Controls Over The IPR Module Need
To Be Strengthened**

OIG-03-027

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The Department of the Treasury

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Abbreviations

ACS	Automated Commercial System
CEBB	Customs Electronic Bulletin Board
FY	Fiscal Year
IPR	Intellectual Property Rights
IT	Information Technology
ITC	International Trade Commission
LA STC	Los Angeles Strategic Trade Center
OIG	Office of Inspector General
TCEP	Trade Compliance Enforcement Plan
USPTO	U.S. Patent and Trademark Office

*The Department of the Treasury
Office of Inspector General*

December 3, 2002

Robert C. Bonner
Commissioner
U.S. Customs Service

Intellectual property is defined as the exclusive ownership of an original product created from the work of individual artistic, inventive, and novel ideas. The Government provides protection to owners by allowing registration of these properties under copyrights, trademarks, and patents. These owners can also record their rights with the U.S. Customs Service, who monitor imported and exported goods for possible violation of these rights. Registration records, along with other intellectual property information related to imports, reside in the Customs Automated Commercial System (ACS) Intellectual Property Rights (IPR) Module used by Customs import specialists, inspectors, and other personnel involved with the enforcement of these rights.

We conducted this audit to evaluate Customs' enforcement of IPR. As part of the review, we evaluated the accuracy of data in the IPR Module. We performed fieldwork from August 2001 through May 2002 at Customs Headquarters in Washington, D.C., and at the Customs Management Center and Port office at Long Beach, CA. The audit was included in our *Office of Inspector General Annual Plan for FY 2001*. A detailed description of our objectives, scope and methodology is provided in Appendix 1.

Results in Brief

We found that Customs' enforcement of IPR may be hampered by the lack of reliable data in its ACS IPR Module.

The IPR Module used by Customs import specialists, inspectors, and other personnel involved with IPR enforcement did not have

accurate, complete, and reliable information. The IPR Module contained data that were entered into the system incorrectly. This was caused by data input errors that we believe could be mitigated by the use of two standard input forms—one form that would enable IPR owners to submit their recordation application information in a uniform and consistent manner and a second internal form for data entry and quality control. We also found a lack of adequate access controls to the system and the files.

We made several recommendations to improve the management of the IPR Module. We recommended that Customs: (1) develop and use a standard recordation application form and data entry tracking/quality control form, (2) establish policy and procedures to ensure that all original files containing trademarks, trade names, and copyrights are properly maintained, (3) correct errors in the IPR Module that we identified, (4) post a disclaimer on the Customs Electronic Bulletin Board (CEBB) to advise users of the existence of unreliable or incomplete data, and (5) allow access to the IPR files only to employees who have a justified need for authorized access. The CEBB is an automated system that provides the trade community with relevant current information about Customs operations and items of special interest.

Background

American industries have been losing profitability and competitiveness because of unfair trade practices, especially the infringement of copyrights, trademarks, patents, and similar IPR violations. It is estimated that between 5 to 8 percent of all goods and services sold worldwide are counterfeit. It is also estimated that businesses in the U.S. lose in excess of \$100 billion annually due to counterfeiting and piracy. Counterfeit products pose both a health and safety risk to the public. Because of its border control responsibilities, the U.S. Customs Service is on the front line to combat the growing economic threat that the U.S. faces from counterfeit and pirated goods.

Preventing IPR Violations

To fulfill its statutory and regulatory obligations of preventing the importation of merchandise that violates certain trademarks, trade names, and copyrights that have been registered with the U.S. Patent and Trademark Office (USPTO) or the U.S. Copyright Office, Customs is vested with the authority to: (1) exclude from entry, (2) detain, and/or (3) seize violative trademark and copyright goods. Violative trademark and copyright goods infringe on a company's IPR. An IPR implies exclusive ownership of inventive, artistic, descriptive, and novel works.

The following definitions are applicable in understanding Customs' enforcement role.

Trademark

Under U.S. law, a trademark is defined as a word, name, symbol, device, color, or combination thereof used to distinguish goods, which identifies origin and ownership. Customs is responsible for protecting trademarks that are registered with the USPTO.

Trade Name

A trade name is the name under which a company does business. Trade names are not registered with the USPTO, but may be recorded with Customs if the name has been used to identify a trade or manufacturer for at least 6 months.

Patents

Patents in the U.S. are registered with the USPTO for any useful process, machine, manufacture or composition of matter or any new and useful improvement thereof. U.S. Customs' patent enforcement differs from trademark and copyright enforcement in that enforcement authority is specifically limited to enforcing certain court orders and enforcing Exclusion Orders issued by the U.S. International Trade Commission (ITC). Customs is without legal authority to determine patent infringements.

Copyright

A copyright protects the tangible expression of an idea and gives the copyright holder the right to prevent the unauthorized use of the holder's work. A copyright may exist in: literary works, musical works, dramatic works, pantomimes and choreographic works, pictorials, graphics and sculptural works, motion pictures, and other audio visual works, sound recordings, and architectural works. A copyright is registered with the U.S. Copyright Office; Customs' protection of copyrighted works is primarily concentrated on works that have been recorded with the agency.

Infringement Of An IPR

Infringement of an IPR involves the use of a protected right without authorization from the right's holder. Customs is empowered to make substantive decisions pertaining to trademark and copyright infringement. Customs' authority to enforce IPR is primarily contained in Titles 19, 18, 17, and 15 of the U.S. Code, Title 19 of the Code of Federal Regulations, and Part 133 of Customs Regulations – *Trademarks, Trade Names and Copyrights*.

Accomplishing The Enforcement Mission

Customs IPR enforcement mission is accomplished through the cooperation of various disciplines within Customs in targeting infringing merchandise and taking enforcement actions.

Each year Customs develops a Trade Compliance Enforcement Plan (TCEP) that identifies the work needed to achieve trade compliance strategic goals, and is linked directly to Customs' Strategic and Annual Plans.

Usually the annual TCEP includes an IPR Sub Plan, however, due to the events of September 11, 2001, a Fiscal Year (FY) 2002 plan was not formalized.

Formal Planning has traditionally led to IPR seizures, and should continue to play a role in IPR enforcement. However, despite

the absence of a FY 2002 TCEP, Customs IPR seizures have increased. Greater post September 11 vigilance and vigorous enforcement of recent copyright legislation have contributed to such results.

Customs has chartered a workgroup for developing a FY 2003 IPR strategic plan.

Seizures

Goods that violate IPR are either smuggled into the U.S., or entered legitimately but not described on documents presented to Customs for entry. While traditional seizures for IPR violations are of articles destined for entry into the U.S., there have been a significant number of seizures of infringing items leaving the country.

Customs' top IPR commodity seizures include wearing apparel, media, watches/parts, batteries, cigarettes, toys/electronic games/trading cards, computer hardware, sunglasses, handbags/wallets/backpacks, and footwear. The top 10 countries for IPR seizures in FY 2001 were: China (46 percent of total seizures), Hong Kong, Korea, Singapore, Taiwan, United Arab Emirates, Netherlands, Honduras, Pakistan, and Thailand.

Customs Outreach Efforts

Customs frequently interacts with, or conducts outreach efforts, for trade associations and representatives from various industries that have a vested interest in protecting IPR. These organizations often provide invaluable assistance to Customs. The trade associations include: Recording Industry Association of America, Software and Information Industry Association, International Anti-Counterfeiting Coalition, Interactive Digital Software Association, Motion Picture Association of America, International Trademark Association, Business Software Alliance, Pharmaceutical Research and Manufacturers of America, International Intellectual Property Alliance, and others.

Finding and Recommendations

Finding **Inadequate Procedures And Controls Result In IPR Data Not Always Being Accurate, Complete Or Reliable**

We found that the IPR Module used by Customs import specialists, inspectors, and other personnel involved with IPR enforcement did not have accurate, complete and reliable information pertaining to IPR to help Customs field personnel identify IPR infringements. Contributing to this problem was a recordation process that lacked a standard data input form and sufficient internal controls to prevent errors from occurring. In addition, the IPR Module recordation data available to the public on the CEBB, which is maintained by the Office of Information and Technology, was unreliable. A computer system failure in 1999 caused some data to be corrupted, inaccessible, and unreliable.

Our review also disclosed that many employees had unjustified access to IPR function codes that allowed them access to add, change, or delete recordation data within the IPR Module. This condition occurred due to a lack of information technology (IT) controls that ensure only authorized employees have access to the data. We discussed this matter with IPR Branch officials, who told us they took appropriate corrective action by requesting IT officials to eliminate access to the IPR user function codes for 25 individuals. We also found a lack of maintenance and accountability over the original files of IPR recordations by the IPR Branch. The files were stored in a room that afforded open access to all who entered the room, and there were no restrictions or monitoring on the removal of recordation files.

Lack Of Accurate, Reliable, And Complete IPR Information

We found problems in recording information in the IPR database and in maintaining the CEBB database, which made both databases inaccurate and/or incomplete.

IPR Database Errors And Omissions

The IPR Module is an important enforcement tool used by Customs officials in the determination of IPR violations. Therefore, Customs officers using the IPR Module must be provided with data that is accurate and complete. Our sample review of IPR recordations disclosed numerous data input errors.

In most cases, the information contained in the IPR Module was sufficient enough for a Customs officer to determine if an IPR issue existed. Inaccurate or incomplete IPR data, however, may hinder Customs' efforts in detecting infringing intellectual property importations.

Customs ACS is a comprehensive tracking, controlling, and processing system that permits on-line query of Customs' databases. To help Customs inspectors and other authorized personnel become more efficient and effective in enforcement efforts concerning IPR infringements, Customs created an IPR Module within ACS. The IPR Module is an electronic index of over 25,000 IPR recordations. The system's keyword and other search capabilities allow inspectors, import specialists, and other Customs users nationwide to query and search the IPR database for copyright, trademark, trade name, patent surveys and exclusion order information. It also incorporates imaging technology – photographs, drawings and graphics often convey the nature of intellectual property more effectively than words.

We sampled recordations to determine if the data maintained in the IPR database had been entered completely and accurately. We found errors where the data in the system could not be verified to the original recordation input documentation.¹ The following are some examples of the errors/omissions:

- Owner names, keyword identifiers, and product names were not spelled properly.

¹ Original documents include the registration certificate from USPTO or U.S. Copyright Office and a recordation application letter from the IP owner.

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- The “Place of Manufacture” field, which required a 2-digit alpha country code, was either blank or contained an erroneous country code, e.g., several recordations should have been entered as China (CN) but were actually input as Switzerland (CH); Japan (JP) was entered as Jordan (JO); and Indonesia (ID) was entered as India (IN).
 - Licensees were either omitted from the record completely, were not all listed as stated on the IP owner’s application letter, or their names were misspelled.

Recordation Application Process Needs To Be Strengthened

Lack of an established standard form covering the IPR data required to be recorded with Customs, and lack of quality control procedures over the input of recordation data into the IPR Module contributed to the data reliability problems.

Intellectual property owners seeking to record their rights with Customs are required to submit an application letter to the Customs Office of Regulations & Rulings (OR&R), IPR Branch. The application must contain specific information² such as the name and complete address of the IPR owner or owners, places of manufacture, and name and principal address of licensees. It must also contain the identity of any parent or subsidiary company or other foreign company under common ownership or control which uses a trademark abroad, or a statement setting forth the name(s) of the performing artist(s). Furthermore, it must include any other identifying names appearing on the surface of reproduction of a sound recording, its label, or container relative to a copyright recordation.

We found that the required information on application letters was not always complete or clear enough to facilitate the entry of data into the IPR Module by the IPR Branch paralegal staff. Many application letters, with attachments, are submitted for multiple recordations that identify different criteria for each recordation. The data entry process can be cumbersome as the paralegals attempt to sort through the documents to make sure

² Specifically stated in Title 19, Customs Duties, Part 133, Trademarks, Trade Names and Copyrights.

the correct information is entered for the specific recordation that is being input to the Module.

We believe that a standard recordation application form should be established that would not only allow for pertinent data to be submitted in a more uniform and complete manner, but would also assist the paralegals in processing the applications more timely and efficiently. The form could be constructed to parallel the IPR Module's data fields.

Also contributing to the data input errors was a lack of formal supervisory internal controls covering the entire recordation process within the IPR Branch. Although we saw evidence of a useful IPR recordation checklist, it was not used on a consistent and routine basis. We believe an internal control form should be established to specifically track and document all aspects of the recordation process after the assignments are given to the IPR Branch paralegals. This form should be attached to every recordation application and include dates and signatures documenting the progress and supervisory review of the data entry. Utilization of this form should help improve the quality controls covering the recordation process and enhance the accuracy and reliability of the IPR enforcement data in the Module.

We also believe it should be a standard requirement that once an application has been entered into the IPR Module, the application entry screen should be printed and a copy should be included in the permanent IPR owner files maintained by the IPR Branch. Customs officials told us that this practice has been in place since 1999 and is a requirement of standard operating procedures being drafted.

IPR Recordation Data On The CEBB Was Unreliable

During our sample review of the 378 recordations, we tested the items to determine if the recordations could be located on the IPR CEBB. We were unable to access 181 of the 378 recordations. We believe this was caused, in part, by a system failure a few years ago that corrupted the software and had yet to be corrected. The CEBB is an automated system that

provides the trade community with relevant current information about Customs operations and items of special interest. The IPR database posted on the CEBB is based on redacted and consolidated data that is extracted from the IPR Module in ACS and is updated monthly. It also contains information relating to the enforcement of ITC exclusion orders by Customs.

Weak Controls Allowed Inappropriate Access To IPR Information

We found weak controls that allowed unjustified access by a number of employees to the IPR database and to the IPR files.

Employees Had Unjustified Access To IPR Function Codes

We identified 25 Customs employees who were improperly assigned access codes that could allow them to add, change, or delete IPR recordation data in the IPR Module. This condition occurred due to a lack of IT controls; only those employees with a need for access to the system should be granted such access. As a result, accountability for data discrepancies in the system could not be affixed with absolute certainty and the integrity of the system was vulnerable.

During our on-site review, we discussed this problem with Customs officials, who told us they took appropriate corrective action by eliminating all 25 employee names from the IPR Module's utilization listing.

No Controls Over Maintenance And Accountability Of Files

Our sample review of 378 original IPR recordation documents disclosed that source documentation folders were stored on shelves in an easily accessed room at Customs Headquarters. This room provided storage for not only IPR source documentation files, but also legal files from other branches within OR&R. We found that there was no central control for the recordation files, no restrictions for removal of the files, and an open file room that allowed for unrestricted access.

The IPR Branch staff for legal research and determination purposes often uses the original IPR recordation files.

Therefore, the loss of original files or the inability to locate an original file would be detrimental to the legal work conducted by the IPR Branch.

Recommendations

1. We recommend that the Commissioner of Customs direct the Office of Regulations & Rulings to develop and use a standard IPR recordation application form and data entry tracking/quality control form.

Management Comment. Customs concurred and is in the process of developing a format for recordation applications that will be posted on its website for applicants to follow and will generally correspond to the ACS module screens to improve the consistency of information input into existing fields. This format will not be an "official" form but a suggested format and will be posted the next time Customs Regulations on IPR are revised with a completion date of August 30, 2003.

The data entry tracking/quality control form has been completed and is in the form of a checklist that, when completed, will be filed in every recordation file.

OIG Comment. We consider this recommendation to have a management decision with a target completion date of August 30, 2003. However, final action is pending because the IPR recordation application format has not been completed and posted to the website for applicant usage.

2. We recommend that the Commissioner of Customs direct the Office of Regulations & Rulings to establish policy and procedures to ensure that all original IPR recordation files containing trademarks, trade names, and copyrights are properly maintained.

Management Comment. Customs concurred and is in the process of drafting standard operating procedures to

accomplish a consistent approach to maintaining the original recordation files with a completion date of August 30, 2003.

OIG Comment. We consider this recommendation to have a management decision with a target completion date of August 30, 2003. Final action will be completed when the SOP is finished and implemented.

3. We recommend that the Commissioner of Customs direct the Office of Regulations & Rulings to correct errors in the Automated Commercial System IPR Module identified by OIG auditors.

Management Comment. Customs has made these corrections.

OIG Comment. Customs has made corrections to errors we brought to their attention during the audit. We consider this recommendation to have a management decision with final action completed.

4. We recommend that the Commissioner of Customs direct the Office of Information Technology to Post a disclaimer on the IPR public Customs Electronic Bulletin Board to advise users of the limitations of the database.

Management Comment. Customs concurred and is in the process of the final processing of the disclaimer before posting on the website. The disclaimer will be posted before August 30, 2003.

OIG Comment. We consider this recommendation to have a management decision with a target completion date of August 30, 2003. Final disposition is pending the posting of the disclaimer to the website.

5. We recommend that the Commissioner of Customs direct the Office of Regulations & Rulings to establish adequate accountability controls to ensure that access to the IPR original owner physical files are restricted to employees requiring such access.

Management Comment. Customs concurred and has begun corrective action by placing locks on secured file room doors. A Security Access Card Reader System is in process and should be operational by February 28, 2003, allowing only personnel from the Office of Regulations & Rulings with approved Mint Annex badges access to the room.

OIG Comment. We consider this recommendation to have a management decision with a target completion date of February 28, 2003. Final action will be completed when the card reader system is installed.

* * * * *

We would like to extend our appreciation to Customs for the cooperation and courtesies provided to our staff during the review. If you have any questions, please contact me at (617) 223-8640 or Robert Mello, Audit Manager, at (617) 223-8643. Major contributors to this report are listed in Appendix 3.

/s/

Donald P. Benson
Regional Inspector General for Audit

The objective of this audit was to evaluate Customs' overall performance in fulfilling its statutory and regulatory obligations to enforce IPR laws and regulations. As part of this review, we evaluated the accuracy of the IPR Module within Customs' Automated Commercial System (ACS).

To achieve these objectives, we reviewed Customs' Strategic Plan, IPR laws and regulations, Customs' policies and procedures, and IPR publications and guidance issued by Customs Headquarters. We reviewed an internal report, produced by Customs' Los Angeles Strategic Trade Center (LA STC) dated July 30, 2001, titled: "Intellectual Property Rights, Evaluation and Risk Assessment Project." We conducted our audit work at Customs Headquarters in Washington, D.C., where we interviewed personnel and evaluated various IPR-related documents and products from the following offices that perform IPR related work: Office of International Affairs, Customs Cyber-Smuggling Center, Customs National IPR Coordination Center, Office of Trade Relations, Office of Regulations & Rulings - IPR Branch, and the Office of Field Operations - Commercial Enforcement Branch. We obtained IPR-related training information from the Customs Office of Training and Development.

We reviewed and evaluated IPR interventions, covering FYs 2000 and 2001, which were coordinated by the LA STC.

We also visited the Customs Port in Long Beach, CA, and met with both staff from the LA STC and other port officials involved with IPR enforcement operations.

We met with representatives from the following trade associations and companies to obtain their comments concerning Customs IPR enforcement efforts: Recording Industry Association of America, Software and Information Industry Association, International Anti-Counterfeiting Coalition, Interactive Digital Software Association, Motion Picture Association of America, Inc., an attorney from the Gibney,

Anthony and Flaherty Law Firm representing Rolex and Louis Vuitton, and the Trademark Counsel for The Gillette Company.

We conducted 5 audit tests of the data (over 25,000 records) contained in the IPR Module to determine if it was reliable, complete, and accurate. Test one involved a sample of 339 IPR recordations covering FYs 1999 through 2001. The purpose of this test was to determine if a registration certificate, issued by either the U.S. Patent and Trademark Office or the U.S. Copyright Office, was on file in support of the recordation. The second test involved a random sample of 260 recordations. Since recordation applications are filed alphabetically by owner name in Customs' IPR Branch, we randomly chose 10 recordations from the physical file folders for each letter of the alphabet. We checked three fields of data (recordation number, owner name, and product description) from each of the 260 recordations and verified the information with the data contained in the IPR Module.

Our third test concerned data accuracy. Using analytical software, we randomly selected a sample of 378 recordations from the IPR Module and chose 13 key data elements, such as product description, contact name, owner name, place of manufacture, licensees, and so forth. We verified the data with information contained on the registration documents and recordation application letters submitted by the intellectual property owners to Customs' IPR Branch.

We also used the analytical software to conduct the fourth test and scanned the entire IPR Module database to determine if key data was missing from the data fields containing the IP owner's name, the contact name, the expiration date, and the gray market indicator.

For the fifth test, using the 378 recordations from our test three sample, we queried the IPR postings on Customs' IPR Electronic Bulletin Board (CEBB), which is available for the public's use, and verified the accuracy and completeness of the selected data that is posted on the CEBB.

Audit fieldwork was performed from August 2001 through May 2002. We conducted our audit in accordance with generally accepted government auditing standards.



U.S. Customs Service

Memorandum

DATE: **November 20, 2002**

FILE: AUD-1-OP CN

MEMORANDUM FOR DONALD P. BENSON
OFFICE OF INSPECTOR GENERAL

FROM: Acting Director
Office of Planning

SUBJECT: Comments on Inspector General Draft Report
on IPR

Thank you for providing us with a copy of your draft report entitled "Trade and Passenger Processing: Customs IPR Enforcement Strategy and Management Controls Over the IPR Module Need To Be Strengthened" and the opportunity to discuss the issues in this report.

Customs has taken a number of steps to address the issues identified during your review. These steps, and additional on-going actions, are outlined in the attached document.

We have determined that the information in the audit does not warrant protection under the Freedom of Information Act.

If you have any questions regarding the comments, please have a member of your staff contact Ms. Cecelia Neglia at (202) 927-9369.


Kathleen J. Bell

Attachment

T R A D I T I O N



S E R V I C E



H O N O R

Attachment

Responses to Audit Recommendations
OIG Draft Report on IPR

Finding 1: Inadequate Procedures And Controls Result In IPR Data Not Always Being Accurate, Complete Or Reliable

Recommendation 1 - We recommend that the Commissioner of Customs direct the Office of Regulations & Rulings to develop and use a standard IPR recordation application form and data entry tracking/quality control form.

Response: Concur. A standardized recordation format is in the process of being created with the information required by the Customs Regulations (19 CFP Part 133). This format will not be an "official" form, but a suggested format, which will be placed on the Customs web site and will be included the next time the Customs Regulations on IPR are revised. This format will generally follow the current ACS module screens in order to improve the consistency of information input into existing fields. IPR Branch has completed the recordation checklist, which will go in every recordation file.

Planned completion date: August 30, 2003

Recommendation 2 – We recommend that the Commissioner of Customs direct the Office of Regulations & Rulings to establish policy and procedures to ensure that all original IPR recordation files containing trademarks, trade names, and copyrights are properly maintained.

Response: Concur. An SOP is being drafted. This document will be utilized by the appropriate IPR Branch staff to insure a consistent approach to the recordation application as well as to the maintenance of the master IPR owner's recordation file. The SOP is intended to cover updates to an existing recordation, including change of contact names and phone numbers, change in ownership and renewals of the existing registration. One hard copy of an expired recordation will be kept in the master file for continuity (background material) and the other four copies of the expired recordation will be discarded. A screen print of all the pages of a recordation (with reviewer's signature and date approving the recordation) will continue to be included in the master IPR Owner's recordation file, as is currently the Standard Practice.

Planned completion date: August 30, 2003

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Recommendation 3 – We recommend that the Commissioner of Customs direct the Office of Regulations & Rulings to correct errors in the Automated Commercial System IPR Module identified by OIG auditors.

Response: Concur. The IPR Branch has corrected the errors identified by the OIG.

Planned completion date: Completed

Recommendation 4 – We recommend that the Commissioner of Customs direct the Office of Information Technology to post a disclaimer on the IPR public Customs Electronic Bulletin Board to advise users of the limitations of the database.

Response: Concur. OIT will post a disclaimer on the IPR public Customs Electronic Bulletin Board, which advises users of the limitations of the database. Language for the disclaimer has been drafted and must now be staffed throughout OIT and other Customs Offices.

Planned completion date: August 30, 2003

Recommendation 5 – We recommend that the Commissioner of Customs direct the Office of Regulations & Rulings to establish adequate accountability controls to ensure that access to the IPR original owner physical files are restricted to employees requiring such access.

Response: Concur. The Operational Oversight Division has the duty and responsibility to maintain the file room. Locks have been placed on secured file room doors. The Office of Logistics is working on installing the Security Access Card Reader System. The system will be in use by February 2003. Only ORR employees with approved Mint Annex badges will have access to the file room.

Planned completion date: February 28, 2003

Office of Inspector General

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